

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JIM TROTTER,	:	
Plaintiff,	:	
	:	23-cv-8055 (JSR)
-v-	:	
	:	
THE NATIONAL FOOTBALL LEAGUE; NFL	:	<u>ORDER</u>
ENTERPRISES LLC; AND NFL NETWORK	:	
SERVICES, INC.,	:	
	:	
Defendants.	x	

JED S. RAKOFF, U.S.D.J.

On August 22, 2024, at the Court's direction, each party submitted a letter brief (which will docketed) regarding two additional discovery issues: (1) disagreements over discovery search terms for plaintiffs and defendants; and (2) dispute over the electronically stored information ("ESI") protocol. Subsequently, the Court ruled during a telephonic conference with the parties on the same day that, (1) the search terms for the search of plaintiff's documents proposed in the defendants' submission (and with the proposed modifications contained therein) must be used by plaintiff; and (2) the parties must adopt the ESI protocol that was submitted by defendants in the same letter submission, with the exception that the protocol will include plaintiff's proposed modification regarding definition of systems not subject to manual review.

The Court then permitted the parties to submit a further letter submission by August 23, 2024, to reflect any further agreements the parties might reach with respect to the proposed search terms for defendants' documents. The only such letter submitted, however, was a letter from plaintiff's counsel (which will also be docketed) indicating in effect that no further agreements had been reached. Accordingly, the Court hereby issues a ruling that the following search terms are to be used by defendants in their search of documents in each of the categories identified in the parties' prior written submissions:

Category 1: This category of documents will utilize the search terms proposed by defendants.

Category 2: This category of documents is restricted to the time period 1/1/2022 through 5/31/2023 and it will utilize the search terms proposed by plaintiff.

Category 3: This category of documents will utilize the search terms proposed by defendants.

Category 4: This category of documents will utilize the search terms proposed by plaintiffs, but with the terms "Align*", "Fire*", and "Renew*" removed.

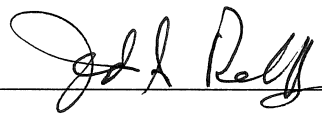
Category 5: This category of documents is restricted to the time period 1/1/2022 through 5/31/2023 and will utilize the search terms proposed by defendants.

Category 6: This category of documents is restricted to the time period 1/1/2022 through 5/31/2023 and will utilize the search terms proposed by plaintiffs.

Category 7: This category of documents will utilize the search terms set forth in Exhibit A to plaintiff's August 23, 2023 submission.

SO ORDERED.

Dated: New York, NY
August 23, 2024


JED S. RAKOFF, U.S.D.J.